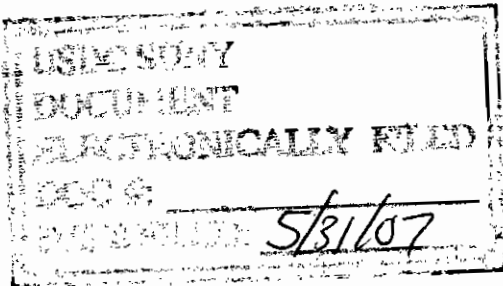


MEMO ENDORSED

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May 31, 2007

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Honorable P. Kevin Castel
United States District Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

JOINT APPLICATION

Re: Federal Insurance Company
v. Expeditors International of Washington, Inc., et al.
07 Civ. 3166 (PKC)
Our Files: 6C-1364 & 7C-1489

Dear Judge Castel:

I represent the plaintiff in this action which involves claims for cargo damage. I have conferred with defense counsel as required by Your Honor's rules. It appears that it will be necessary to join additional parties. Mr. Badiak informed me that he intends to seek permission to file a third-party complaint. For this reason, and keeping in mind that the claims are the type which should be the subject of early settlement discussions, counsel join in respectfully requesting that the June 1, 2007 initial court conference be rescheduled for a date in mid-July or early August. This is the first application for an adjournment in this action and I apologize for the timing of the request.

Respectfully,


David L. Mazaroli
dlm@mazarolilaw.com

DLM/jcf

cc: Badiak & Will LLP
Attn.: Roman Badiak, Esq.:
(Via e-mail: rbadiak@badiakwill.com)

Conference adjourned from June 1 to July 20, 2007 at 10:30 a.m.
S.O. ORDERED
USPJ 5-31-07